UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 30 2008

REPLY TO THE ATTENTION OF

RRG Clayton Chemical Site - Soils

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RRG/CLAYTON CHEMICAL SITE PRP Group
c/o: Sharon R. Newlon, Esq.
Dickinson Wright, PLLC
500 Woodward Avenue, Suite 4000
Detroit, MI 48226

Re: Second Amendment to October 27, 2005 Administrative Settlement Agreement and Order on Consent for Removal Action for the RRG/Clayton Chemical Soils Site, Sauget, IL
(No. V-W-05-C-829)

Dear Madam:

Enclosed please find an executed copy of the Second Amendment to the October 27, 2005, Administrative Settlement Agreement and Order on Consent for Removal Action for the above-referenced Site pursuant to Sections 104, 107 and 122 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, as amended, 42 U.S.C. Sections 9604, 9607 and 9622. Thank you for your cooperation in this matter.

If you have any questions regarding this Amendment to the Administrative Settlement Agreement, please contact Tom Turner, Associate Regional Counsel, at 312/886-6613 or Kevin Turner, On-Scene Coordinator, at 618/997-0115.

Sincerely yours,

Richard C Karl

Richard C. Karl, Director
Superfund Division

Enclosure

cc: State Agency Superfund Program Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 5

IN THE MATTER OF:	)	Docket No. V W 05-C-829
	)	
RESOURCE RECOVERY GROUP/	)	ADMINISTRATIVE SETTLEMENT
CLAYTON CHEMICAL SITE	)	AGREEMENT AND ORDER ON
Sauget, Illinois	)	CONSENT FOR REMOVAL ACTION
	)	Proceeding Under Sections 104, 107 and
Respondents:	)	122 of the COMPREHENSIVE
	)	ENVIRONMENTAL, RESPONSE,
Listed in Attachments A & B	)	COMPENSATION, AND LIABILITY
	)	ACT, as amended, 42 U.S.C. §§ 9604,
	)	9607 and 9622

SECOND AMENDMENT TO ADMINISTRATIVE SETTLEMENT AGREEMENT AND ORDER ON CONSENT FOR REMOVAL ACTION PURSUANT TO SECTIONS 104, 107 and 122 OF THE COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT, as amended, 42 U.S.C. §§ 9604, 9607 and 9622

The Administrative Settlement Agreement and Order on Consent ("Order"), U.S. Environmental Protection Agency ("U.S. EPA") Docket No. V W 05-C-829, issued on 10-27-05 under Sections 104, 107 and 122 of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §§ 9604, 9607 and 9622, is hereby modified as follows:

ORDER i) Attachments A & B of the Order shall be amended to include additional performing and nonperforming members of this Order as identified in the attachments A & B; ii) In addition the Order shall be amended to include the attached Work Plan Amendment:

This Second Amendment to the Resource Recovery Group/Clayton Chemical Site Administrative Settlement Agreement and Order on Consent is hereby incorporated into the Order as if it were originally a part of the Order; all terms, conditions, and stipulations of the Order shall apply to this Second Amendment.

By: Richard C Karl
Richard C. Karl, Director
Superfund Division
U.S. Environmental Protection Agency
Region 5

IN THE MATTER OF:

Resource Recovery Group/Clayton Chemical Site (soil)
1 Mobile Avenue, Sauget, Illinois

The undersigned representative of Respondent certifies that he or she is fully authorized to enter into the terms and conditions of this Settlement Agreement and to bind the party they represent to this document.

Agreed this 21st day of July, 2006.

For Respondent Rexam Beverage Can Company

By James L. Kiser

J L Kiser

Title Corporate Counsel

IN THE MATTER OF:

Resource Recovery Group/Clayton Chemical Site (soil)
1 Mobile Avenue, Sauget, Illinois

The undersigned representative of Respondent certifies that he or she is fully authorized to enter into the terms and conditions of this Settlement Agreement and to bind the party they represent to this document. BP Products North America, Inc.

Agreed this 19 day of September, 2006.

For Respondent

By: _____

Title: Regional Manager

Attachment A
Performing Members of the PRP Group
Amended July 2007

Afton Chemical Corporation
Allied Healthcare Products, Inc.
American Recreation Products, Inc.
ADM (Archer Daniels Midland)
Anheuser-Busch Company, Inc
including affiliates St. Louis Refrigerator Car Co., and Metal Container Corporation
Arris International, Inc.
Baker Petrolite Corporation
Bemis Company Inc.
Cerro Flow Products, Inc.
Chemisphere Corporation
Chicago Drum, Inc.
Conopco, Inc.(Cheseborough Ponds)
Crown Holdings Inc., .
including Crown Cork & Seal Co., Inc., and Continental Can Co. (f/k/a Crown Beverage Packaging, Inc.)
Curwood Inc.
DaimlerChrysler Corporation
Dow Chemical Company (The)
ExxonMobile Oil Corporation
Ford Motor Company
The Glidden Company
Hussman Corporation
Illinois Central Railroad Company
f/k/a Illinois Gulf Central Railroad/ Gulf, Mobile & Ohio Railroad
INX International Ink Company
Koch Industries, Inc.
Lear Corporation
including United Technologies
Lincoln Industrial Corporation
Mallinckrodt Inc.
Marchem Corporation
McIntyre Group, LTD
Mitsubishi Motors North America, Inc.
Nascote Industries, Inc.
National Coatings Inc.
Nordenia/M&W Packaging
Norfolk Southern Railway Company
Olin Corporation
Penn Aluminum International, Inc.
Precoat Metals (Sequa Corporation)
Rexam Beverage Can Company
Riley Brothers Co
Sterling Lacquer Manufacturing Company
Superior Oil Co.
Teva Phamaceuticals
including BioCraft Labs
Tnemec Company, Inc.
U.S. Paint Corporation
Valentec Wells, LLC
Walker Paducah Corp

Attachment B
Non-Performing Members of the PRP Group
Amended July 2007

Agfa Corporation, as parent and successor to Lastra Amercia Corp.
Alberici Constructors, Inc. f/k/a Alberici Construction Company
American Greet ngs Corp.,
Aramark Uniform & Career Apparel
including Aratex Services, Inc. and Todd, Inc.
Associated Electric Cooperative, Inc. (AECI)
BASF Corporation
Bachman Machine Co.
Basler Electric Co.
Bell Sports, Inc.
The Boeing Co.
including McDonnell Douglas
BP Products North America Inc.
Brewer Science Inc.
Carlisle Syntec Inc.
ChemCentral Midwest Corporation
Chevron Environmental Management Company for itself and on behalf of Chevron USA, Inc.
Clean The Uniform Company St. Louis f/k/a Clean Coverall Supply Co., Inc.
CNH America LLC as alleged successor to DMI
Cooper US, Inc. (Bussman)
Crane Co.
Elementis Chemicals Inc
including Thompson Hayward Chemical Co/Harcros Chemicals
EnPro Industries, Inc.
Esco Technologies
Fort Transfer Co.
Gardner Denver, Inc.
General Motors Corporation
Hallmark Cards, Inc.
Heritage Environmental Services, L.L.C.
Illinois Tools Works Inc. (Diagraph)
Interlake Material Handling, Inc.
The Grigoleit Company
The Knapheide Mfg. Co.
Komatsu American International Co.
Komatsu Mining Systems, Inc.
LHB Industries
Lastra Amercia Corporation
Masterchem Brands, Inc.
MeadWestvaco Consumer Packaging Group, LLC f/k/a AGI Incorporated
The Meramec Group
Mid States Paint
Morton Metalcraft
Nashua Corporation
Nooter Corporation
P D George Company
Parsons Company
Pechiney Plastic Packaging Inc.
Perma Fix Environmental Services
Polyone Corp., Successor to Dennis Chemical Co.

WORK PLAN AMENDMENT

1.0 INTRODUCTION

1.1. GENERAL

The following is an Amendment to the Work Plan that describes those activities that are being conducted to address the presence of mixed PCBs and characteristic hazardous wastes in the excavated soils and the containment of on-site soils within the central processing area at the Site as shown on **Amendment Exhibit 1**. The Group will be treating the excavated soils for VOCs and lead, as appropriate, and disposing of the stockpiles according to their remaining TSCA profile. This Amendment necessarily impacts the following sections of the Work Plan: Section 4.0 - Excavation Activities, Section 5.0 - Removal Action Closeout activities, and Section 7.0 - Project Schedule.

2.0 AMENDMENTS

2.1. EXCAVATION ACTIVITIES - SOIL TREATMENT

The soils from the excavation activities completed at the site have been stockpiled. Initial disposal samples collected from the stockpiles demonstrated that stockpiles #2 through #6 had analytical results of VOCs above TCLP levels and PCBs above TSCA disposal thresholds. Stockpile 2 also had TCLP levels of lead above the RCRA disposal threshold. Stockpile #1 had neither VOCs nor PCBs and has already been properly disposed of off-site. Stockpile #7 contained no VOCs above TCLP levels, but did contain PCBs. See **Table 1**.

Based upon updated sampling, as shown in **Table 2**, Stockpiles 2, 4 and 5C will be treated, as necessary, for VOC components using chemical oxidation, as described below. Stockpile 2 will also undergo lead stabilization prior to disposal, as described below. It is estimated that approximately 1000 tons (700 cubic yards (yd^3)) of soil will undergo chemical oxidation and/or lead stabilization. Soils with VOCs and lead below the TCLP levels for those constituents, including both treated materials and the remaining stockpiles on-site, will be shipped off-site in accordance with Work Plan Section 3.6.6 to a TSCA approved landfill. The stockpiles are currently underlain by plastic. Loading of the stockpiles for treatment and disposal will include some limited scraping of soils underlying the plastic, as is customary. No further excavation of on-site soils will be conducted. Further soil sampling will be limited to sampling of treated, stockpiled soils to confirm the adequacy of their treatment, as described in sections 2.1.1 and 2.1.2, below.

2.1.1 Chemical Oxidation

The chemical oxidation treatment process will take place within four mix boxes of 40 yd^3 capacity each. For each batch, 25 yd^3 of soil will be loaded into each mix box for processing. The oxidizing reagent (potassium permanganate) will be added to each batch of soils simultaneously with water, the soils will be mixed, and then the 4 soil batches will be staged into a single covered stockpile on plastic for overnight reaction. Processing time within the mix boxes for each batch is estimated at two and one-half hours. Following

overnight reaction time, samples will be collected from the staging piles for TCLP analysis for all RCRA TCLP VOCs. Analysis of the samples is estimated to be complete within 3-4 days. Following confirmation of treatment to below applicable TCLP levels, the soils will be loaded for disposal. Appropriate measures will be taken to control material during the transfer process for treatment. During the various soil loading processes, a fine water mist will be used, as necessary, to control dust. During the chemical addition and mixing processes, the addition of water will be necessary to facilitate oxidation, so the soils will be kept moist.

2.1.2 - Lead Stabilization

The lead stabilization process will be conducted in place at the location of Stockpile #2. A reagent, Enviroblend, a mixture of magnesium oxide and calcium phosphates, will be added to the pile and mixed in as it is added. A fine water mist will be directed onto the stockpile during the addition of the reagent. Following thorough mixing, samples will be collected and analyzed for TCLP lead. Analysis of the samples is estimated to be complete within 3-4 days. Following confirmation of adequate stabilization, the soils will be treated for VOCs via chemical oxidation, as described in section 2.1.1., above.

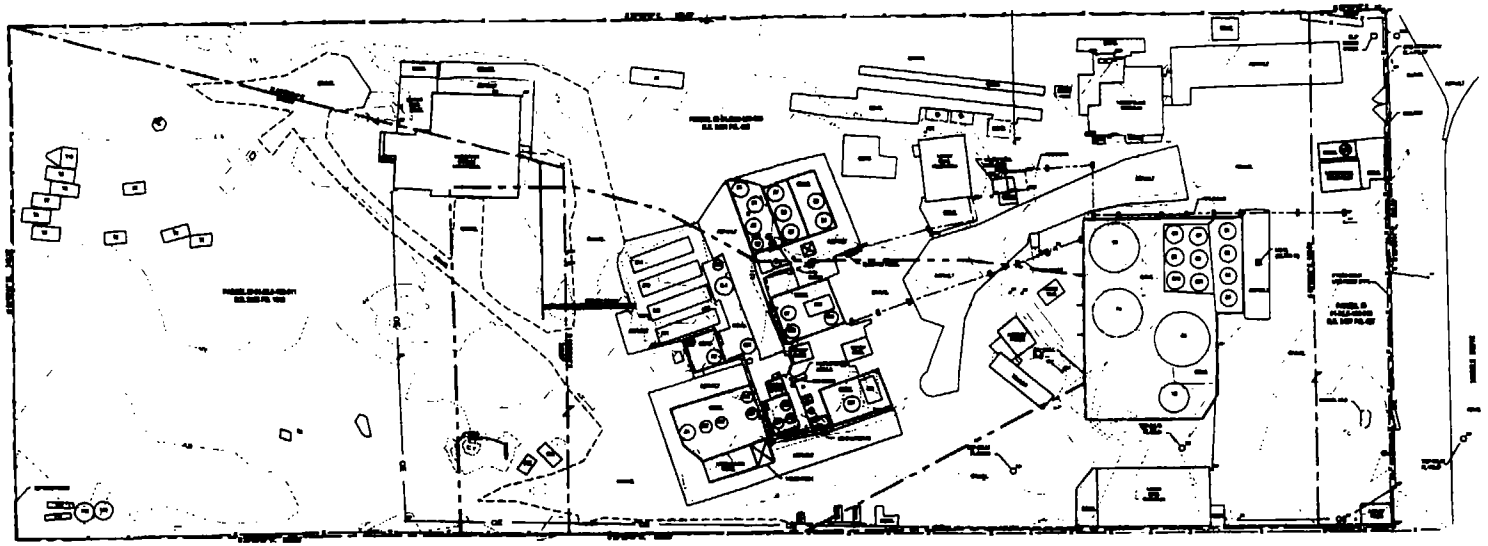
2.2. PROJECT SCHEDULE FOR SOIL TREATMENT

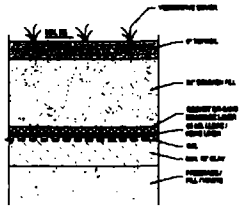
Treatment of the soil has begun. The on-site treatment and off-site shipment of the soils and backfilling of the site is anticipated to continue for approximately eight (8) weeks, assuming that once through treatment of the stockpiled soils will be adequate and that weather conditions will be amenable to the treatment technology. The need for further treatment or poor weather conditions may extend this schedule. Please note that this project timeline is based on an assumed waste shipment rate of 250 tons per day (10 trucks each with 25 tons). The availability of approved waste hauling vehicles and the ability to schedule and load those vehicles on a consistent basis throughout the project has the ability to affect the project timeline.

2.3. REMOVAL ACTION CLOSEOUT - CAP INSTALLATION

EPA intends to issue a Unilateral Administrative Order to pursue certain recalcitrant parties for construction of a cap and implementation of a cap operations and maintenance ("O&M") plan at the Site. EPA will utilize its enforcement authorities under that Order to assure performance of the required cap construction and O&M activities. However, EPA retains its enforcement discretion in all matters involving removal actions at the Site. The PRP Group will not be relieved of such responsibility, and in the event the other parties fail to perform some or all of the cap construction and O&M plan, EPA may seek to hold the PRP Group responsible for any outstanding cap obligations.

A notice of completion of work will be issued by the OSC following completion of construction of the cap and approval of the O&M plan.





TYPICAL CAP CROSS-SECTION

N.T.S.

LEGEND

- CABLE SERVICE BOX
- CLEANOUT
- ELECTRIC SERVICE BOX
- FAUCET
- FIRE HYDRANT
- GAS MAP
- GAS VALVE
- GUARD POST
- LIGHT STANDARD
- MAILBOX
- SIGN
- SIGNPOLE
- SLAB DRAIN PIPE
- POWER POLE
- GUY WIRE
- PIPE BARRIER FOUNDATION
- SERVICE VENT
- WATER MANHOLE
- SMALL MAT PATS IN PROCESS AREA (NEW)
- APPROXIMATE CAP LIMIT

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY

DRAWING STATUS

RRG CLAYTON CHEMICAL SITE
SAUGET, ILLINOIS

PROPOSED CAP AREA LAYOUT

CRA CONESTOGA-ROVERS & ASSOCIATES

		42192-05	MEMO001	C-01

Amendment Exhibit 1

TABLE 1

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS
SOIL STOCKPILE WASTE CHARACTERIZATION SAMPLES

	RCRA Toxic Concentration/TSCA Threshold										
Sample Date		3/24/2006	3/31/2006	3/31/2006	4/6/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006
Sample Time		1430	1100	1200	1600	1400	1410	1420	1500	1530	1600
New Sample ID		Stockpile #1	Stockpile #2	Stockpile #3	Stockpile #4	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #6B	Stockpile #7
New Sample Depth											
PID Reading											
Parameter											
TCLP Metals											
Arsenic	5.0	NA	0.013	0.0052	0.005	ND	NA	NA	ND	NA	ND
Barium	100.0	NA	0.96	1.2	0.46	0.91	NA	NA	1.9	NA	0.84
Cadmium	1.0	NA	0.045	0.23	0.079	0.1	NA	NA	0.18	NA	0.046
Chromium	5.0	NA	0.05	0.087	0.019	0.031	NA	NA	0.057	NA	ND
Lead	5.0	NA	18	1.2	1.1	0.31	NA	NA	1.5	NA	0.41
Selenium	1.0	NA	0.0044	0.0056	ND	ND	NA	NA	ND	NA	ND
Silver	5.0	NA	0.0027	ND	0.017	ND	NA	NA	ND	NA	ND
Mercury	0.2	NA	ND	0.00015	ND	ND	NA	NA	ND	NA	ND
PCBs											
Aroclor 1016		ND	ND	ND	ND	NA	ND	ND	NA	ND	ND
Aroclor 1221		ND	ND	ND	ND	NA	ND	ND	NA	ND	ND
Aroclor 1232		ND	ND	ND	ND	NA	ND	ND	NA	ND	ND
Aroclor 1242		1.2	50	2400	20	NA	510	360	NA	95	33
Aroclor 1248		ND	ND	ND	ND	NA	ND	ND	NA	ND	ND
Aroclor 1254		0.95	40	680	33	NA	220	77	NA	29	13
Aroclor 1260		0.46	11	ND	21	NA	ND	43	NA	31	17
Total	50	2.63	101	3080	74	NA	730	480	NA	155	63

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS
SOIL STOCKPILE WASTE CHARACTERIZATION SAMPLES

	RCRA Toxic Concentration/TSCA Threshold										
Sample Date		3/24/2006	3/31/2006	3/31/2006	4/6/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006
Sample Time		1430	1100	1200	1600	1400	1410	1420	1500	1830	1400
New Sample ID		Stockpile #1	Stockpile #2	Stockpile #3	Stockpile #4	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #6B	Stockpile #7
New Sample Depth											
PID Reading											
Parameter											
TCLP SEMIVOLATILE ORGANIC COMPOUNDS											
2,4,5-Trichlorophenol	400.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
2,4,6-Trichlorophenol	2.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
2,4-Dinitrotoluene	0.13	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
2-Methylphenol	200.0	NA	0.0074	ND	NA	ND	NA	NA	0.02	NA	ND
3/4 Methylphenol	400.0	NA	0.024	0.008	NA	ND	NA	NA	0.079	NA	0.025
Hexachlorobenzene	0.13	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Hexachlorobutadiene	0.5	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Hexachloroethane	3.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Nitrobenzene	2.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Pentachlorophenol	100.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Pyridine	5.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS
SOIL STOCKPILE WASTE CHARACTERIZATION SAMPLES

	RCRA Toxic Concentration/ TSCA Threshold										
Sample Date		3/24/2006	3/31/2006	3/31/2006	4/6/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006
Sample Time		1430	1100	1200	1600	1600	1410	1420	1500	1830	1600
New Sample ID		Stockpile #1	Stockpile #2	Stockpile #3	Stockpile #4	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #6B	Stockpile #7
New Sample Depth											
PID Reading											
Parameter											
TCLP VOLATILE ORGANIC COMPOUNDS											
1,1-Dichloroethene	1.7	NA	0.36	ND	0.44	ND	NA	NA	ND	NA	ND
1,2-Dichloroethane	0.5	NA	4.3	ND	2.0	ND	NA	NA	0.04	NA	ND
1,4-Dichlorobenzene	7.5	NA	0.96	3.5	1.0	1.20	NA	NA	4.0	NA	3.1
Benzene	0.5	NA	6.4	0.17	3.6	0.05	NA	NA	1.5	NA	0.07
Carbon Tetrachloride	0.5	NA	ND	ND	ND	ND	NA	NA	ND	NA	ND
Chlorobenzene	100.0	NA	3.1	3.0	3.0	0.51	NA	NA	11	NA	0.84
Chloroform	6.0	NA	6.8	ND	3.9	ND	NA	NA	0.01	NA	0.01
Methyl ethyl ketone	200.0	NA	1.6	ND	1.6	ND	NA	NA	0.63	NA	0.057
Tetrachloroethene	0.7	NA	3.1	2.7	2.2	0.74	NA	NA	1.7	NA	0.02
Trichloroethene	0.5	NA	45	6.4	29	0.58	NA	NA	2.2	NA	0.036
Vinyl chloride	0.2	NA	ND	ND	ND	ND	NA	NA	ND	NA	ND
TCLP-PESTICIDES											
Chlordane	0.003	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Endrin	0.020	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
gamma-BHC	0.4	NA	ND	0.001	NA	ND	NA	NA	ND	NA	ND
Heptachlor	0.008	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Heptachlor epoxide	0.008	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Methoxychlor	10.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
Toxaphene	0.5	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS
SOIL STOCKPILE WASTE CHARACTERIZATION SAMPLES

	RCRA Toxic Concentration/TSCA Threshold										
Sample Date		3/24/2006	3/31/2006	3/31/2006	4/6/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006	4/18/2006
Sample Time		1430	1105	1200	1400	1400	1410	1420	1900	1830	1800
New Sample ID		Stockpile #1	Stockpile #2	Stockpile #3	Stockpile #4	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #6B	Stockpile #7
New Sample Depth											
PID Reading											
Parameter											
TCLP HERBICIDES											
2,4,5-TP	1.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
2,4-D	10.0	NA	ND	ND	NA	ND	NA	NA	ND	NA	ND
GENERAL CHEMISTRY											
Cyanide		ND	3.0	4.1	0.78	6.8	NA	NA	7.0	NA	3.5
Reactive Sulfide		4.4	3.5	9.8	7.1	ND	NA	NA	ND	NA	ND
Phenolics		1.6	11	25	36	29	NA	NA	42	NA	16
Paint Filter Test		ND	ND	ND	ND	PASS	NA	NA	PASS	NA	PASS
pH		6.9	6.4	6.8	6.4	7.0	NA	NA	7.3	NA	7.2
Ignitibility		>60	NA	NA	NA	>60	NA	NA	>60	NA	>60
Extractable Organic Halides		ND	150	780	640	445	NA	NA	1,530	NA	2,220
Percent Moisture		11	NA	NA	NA	10.3	11.7	11.1	11.5	13.8	10.0

Notes:

1. All concentrations are reported in parts per million.
2. Analytical data shown is from samples collected during 2005-06 Removal Action efforts.

3. Analytical data shown is being evaluated against the *IEPA Soil Remediation Objectives for Commercial/Industrial Properties*, Construction Worker values (IEPA Construction Workers SROs).
4. IEPA Construction Workers SROs (column B) are bolded and italicized for emphasis.

5. Shaded cells are to indicate specific compounds from 2001 Site Assessment that exceeded the evaluation standard (the EPA Region 9 Preliminary Remediation Goals (PRGs).
6. Shaded and bolded cells represent data that exceeded the IEPA Construction Worker SRO.
7. NR means data was requested but not reported.
8. Blank cells means data was neither requested nor reported
9. ND means the analyte was not detected.

TABLE 2

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS
STOCKPILE SAMPLES

	RCRA Toxic Concentration/TSCA Threshold								
Sample Date		8/21/2006	8/21/2006	8/21/2006	8/21/2006	8/22/2006	8/21/2006	8/22/2006	8/22/2006
Sample Time		1625	1445	1605	1500	830	1515	925	905
Stockpile #		Stockpile #2	Stockpile #3	Stockpile # 4/4B	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #7
Sample ID		S-082106-GD-006	S-082106-GD-001	S-082106-GD-007	S-082106-GD-002	S-082206-GD-009	S-082106-GD-003	S-082206-GD-012	S-082206-GD-011
No. of Sample Aliquots		8	16	12 (8 from 4, 4 from 4B)	8	6 (2 from each sub-pile)	8	16	16
Parameter									
TCLP Metals									
Arsenic	5.0	NA	NA	NA	NA	NA	NA	NA	NA
Barium	100.0	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	1.0	NA	NA	NA	NA	NA	NA	NA	NA
Chromium	5.0	NA	NA	NA	NA	NA	NA	NA	NA
Lead	5.0	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	1.0	NA	NA	NA	NA	NA	NA	NA	NA
Silver	5.0	NA	NA	NA	NA	NA	NA	NA	NA
Mercury	0.2	NA	NA	NA	NA	NA	NA	NA	NA
PCBs									
Aroclor 1016		ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1221		ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1232		ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1242		15	1300	72	57	640	290	58	ND
Aroclor 1248		ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1254		20	200	27	97	380	92	510	4.7
Aroclor 1260		ND	ND	ND	ND	ND	ND	5.7	ND
Total	50.0	35	1500	99	154	1120	382	16.5	4.7
Original Totals		101	3000	74	NA	730	480	155	60
Original Sample Aliquots		12	16	12	10	12	10	mean - 26, 68 - 12 (PCB only)	12
TCLP SEMIVOLATILE ORGANIC COMPOUNDS									
2,4,5-Trichlorophenol	400.0	ND	ND	ND	ND	ND	ND	ND	ND
2,4,6-Trichlorophenol	2.0	ND	ND	ND	ND	ND	ND	ND	ND
2,4-Dinitrotoluene	0.13	ND	ND	ND	ND	ND	ND	ND	ND
2-Methylphenol	200.0	ND	ND	ND	ND	ND	ND	ND	ND
3/4-Methylphenol	400.0	ND	ND	ND	ND	ND	ND	ND	ND
Hexachlorobenzene	0.13	ND	ND	ND	ND	ND	ND	ND	ND
Hexachlorobutadiene	0.5	ND	ND	ND	ND	ND	ND	ND	ND
Hexachloroethane	3.0	ND	ND	ND	ND	ND	ND	ND	ND
Nitrobenzene	2.0	ND	ND	ND	ND	ND	ND	ND	ND
Pentachlorophenol	100.0	ND	ND	ND	ND	ND	ND	ND	ND
Pyridine	5.0	ND	ND	ND	ND	ND	ND	ND	ND

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE

SOLIDS REMOVAL ACTION ANALYTICAL RESULTS

STOCKPILE SAMPLES

	RCRA Toxic Concentration/TSCA Threshold								
Sample Date		8/21/2006	8/21/2006	8/21/2006	8/21/2006	8/21/2006	8/21/2006	8/22/2006	8/22/2006
Sample Time		1625	1445	1605	1500	1530	1515	925	905
Stockpile #		Stockpile #2	Stockpile #3	Stockpile # 4/4B	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #7
Sample ID		S-082106-GD-008	S-082106-GD-003	S-082106-GD-007	S-082106-GD-002	S-082106-GD-009	S-082106-GD-003	S-082106-GD-012	S-082106-GD-011
No. of Sample Aliquots		8	14	12 (8 from 4, 4 from 4B)	6	4 (2 from each sub-pile)	6	16	16
TOTAL SEMIVOLATILE ORGANIC COMPOUNDS									
Benzo(g,h,i)perylene		ND	ND	ND	0.22	ND	0.63	ND	ND
Anthracene		ND	ND	ND	ND	ND	ND	ND	ND
Carbazole		ND	ND	ND	ND	ND	ND	ND	ND
Di-n-butyl phthalate		5.7	2.4	980	1.3	5.7	25	23	ND
Fluoranthene		2.2	ND	2.5	0.44	ND	2.4	1.8	ND
Pyrene		3.7	0.72	6.1	0.54	ND	2.4	3.2	1.5
Butyl benzyl phthalate		ND	ND	ND	ND	ND	2.2	ND	ND
3,3' Dichlorobenzidine		ND	ND	ND	ND	ND	ND	ND	ND
Benzo(a)anthracene		1.1	ND	1.1	0.21	ND	1.2	ND	ND
Chrysene		2.1	0.47	3.0	0.41	ND	1.7	1.4	1.1
bis(2 Ethylhexyl)phthalate		62	180	ND	29	14	210	330	12
Di-n-octyl phthalate		ND	ND	ND	ND	ND	ND	ND	ND
Benzo(b)fluoranthene		1.7	ND	ND	0.28	ND	1.5	ND	ND
Benzo(k)fluoranthene		1.5	ND	ND	0.26	ND	1.1	ND	ND
Benzo(a)pyrene		1.1	ND	ND	0.24	ND	1.1	ND	ND
Indeno(1,2,3-cd)pyrene		ND	ND	ND	ND	ND	0.62	ND	ND
Dibenz(a,h)anthracene		ND	ND	ND	ND	ND	ND	ND	ND
Acenaphthene		ND	ND	ND	ND	ND	0.5	ND	ND
2,4 Dinitrophenol		ND	ND	ND	ND	ND	ND	ND	ND
4 Nitrophenol		ND	ND	ND	ND	ND	ND	ND	ND
Dibenzofuran		ND	ND	ND	ND	ND	0.48	ND	ND
2,4 Dinitrotoluene		ND	ND	ND	ND	ND	ND	ND	ND
Diethyl phthalate		ND	ND	ND	ND	ND	ND	ND	ND
Fluorene		ND	ND	ND	ND	ND	ND	ND	ND
4 Chlorophenyl phenyl ether		ND	ND	ND	ND	ND	ND	ND	ND
4-Nitroaniline		ND	ND	ND	ND	ND	ND	ND	ND
4,6-Dinitro-2-methylphenol		ND	ND	ND	ND	ND	ND	ND	ND
N-Nitrosodiphenylamine		ND	ND	ND	ND	ND	ND	ND	ND
4-Bromophenyl phenyl ether		ND	ND	ND	ND	ND	ND	ND	ND
Hexachlorobenzene		ND	ND	ND	ND	ND	ND	ND	ND
Atrazine		ND	ND	ND	ND	ND	ND	ND	ND
Pentachlorophenol		ND	ND	ND	ND	ND	ND	ND	ND
Phenanthrene		1.9	ND	10	0.92	ND	1.7	5.2	0.95
Naphthalene		ND	0.66	5.9	0.46	ND	11	12	ND
4-Chloroaniline		ND	ND	ND	ND	ND	ND	ND	ND
Hexachlorobutadiene		ND	ND	ND	ND	ND	ND	ND	ND
Carbazole		ND	ND	ND	ND	ND	ND	ND	ND
4-Chloro-3-methylphenol		ND	ND	ND	ND	ND	ND	ND	ND
2-Methylnaphthalene		ND	ND	2.5	0.3	ND	2.4	1.6	ND
Hexachlorocyclopentadiene		ND	ND	ND	ND	ND	ND	ND	ND
2,4,6-Trichlorophenol		ND	ND	ND	ND	ND	ND	ND	ND
2,4,5-Trichlorophenol		ND	ND	ND	ND	ND	ND	ND	ND
1,1'-Biphenyl		ND	ND	ND	ND	ND	ND	1.4	ND

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE

SOLIDS REMOVAL ACTION ANALYTICAL RESULTS

STOCKPILE SAMPLES

	RCRA Toxic Concentration/TSCA Threshold								
Sample Date		8/21/2006	8/21/2006	8/21/2006	8/21/2006	8/22/2006	8/21/2006	8/22/2006	8/22/2006
Sample Time		1625	1605	1606	1900	830	1515	925	900
Stockpile #		Stockpile #2	Stockpile #3	Stockpile # 4/4B	Stockpile #5	Stockpile #5B	Stockpile #6C	Stockpile #6	Stockpile #7
Sample ID		S-082106-GD-008	S-082106-GD-001	S-082206-GD-007	S-082106-GD-002	S-082206-GD-009	S-082106-GD-003	S-082206-GD-012	S-082206-GD-011
No. of Sample Aliquots		6	14	12 (8 from 4, 4 from 4B)	6	4 (2 from each sub-pile)	6	16	16
2-Chloronaphthalene		ND	ND	ND	ND	ND	ND	ND	ND
2-Nitroaniline		ND	ND	ND	ND	ND	ND	ND	ND
Dimethylphthalate		ND	ND	ND	ND	ND	ND	ND	ND
2,6-Dinitrotoluene		ND	ND	ND	ND	ND	ND	ND	ND
Acenaphthylene		ND	ND	ND	ND	ND	ND	ND	ND
3-Nitroaniline		ND	ND	ND	ND	ND	ND	ND	ND
Benzaldehyde		ND	ND	ND	ND	ND	ND	ND	ND
Phenol		ND	ND	ND	ND	ND	ND	ND	ND
bis(2-Chloroethyl)ether		ND	ND	ND	ND	ND	ND	ND	ND
2-Chlorophenol		ND	ND	ND	ND	ND	ND	ND	ND
2-Methylphenol		ND	ND	ND	ND	ND	ND	ND	ND
2,2'-oxybis(1-Chloropropane)		ND	ND	ND	ND	ND	ND	ND	ND
Acetophenone		ND	ND	ND	ND	ND	ND	ND	ND
N-nitroso-di-n-propylamine		ND	ND	ND	ND	ND	ND	ND	ND
Hexachloroethane		ND	ND	ND	ND	ND	ND	ND	ND
Nitrobenzene		ND	ND	ND	ND	ND	ND	ND	ND
Isophorone		0.76	2.3	48	0.62	ND	3.0	2.4	ND
2-Nitrophenol		ND	ND	ND	ND	ND	ND	ND	ND
2,4-Dimethylphenol		ND	ND	ND	ND	ND	ND	ND	ND
bis(2-Chloroethoxy)methane		ND	ND	ND	ND	ND	ND	ND	ND
2,4-Dichlorophenol		ND	ND	ND	ND	ND	ND	ND	ND
Total SVOCs (mg/kg)		84.36	186.55	179.1	35.6	19.7	269.1	384	15.55
Stockpile Volume - max (tons)		350	250	400	200	100	100	650	225
Stockpile Volume - max (kg)		317,515	226,796	362,874	181,437	90,718	90,718	589,670	204,117
Max SVOCs (kg)		27	42	65	6.46	1.8	24	226	3
Max SVOCs (tons)		0.030	0.047	0.072	0.007	0.002	0.027	0.250	0.003
TCLP VOLATILE ORGANIC COMPOUNDS									
1,1-Dichloroethene	1.7	ND	ND	0.011	ND	ND	ND	ND	ND
1,2-Dichloroethane	0.5	0.00151	ND	0.13	ND	ND	ND	ND	ND
1,4-Dichlorobenzene	7.5	0.99	0.33	0.75	0.18	1.6	1.8	2.3	1.3
Benzene	0.5	0.0047	0.013	0.18	ND	ND	0.046	0.091	ND
Carbon Tetrachloride	0.5	ND	ND	ND	ND	ND	ND	ND	ND
Chlorobenzene	100.0	0.13	0.11	0.99	0.013	0.18	1.2	2.7	0.021
Chloroform	6.0	0.00096	ND	0.19	ND	ND	ND	ND	0.00057
Methyl ethyl ketone	200.0	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethene	0.7	0.51	0.30	1.1	0.12	0.14	0.97	0.40	0.0082
Trichloroethene	0.5	0.33	0.32	3.7	0.016	0.26	0.63	0.18	ND
Vinyl chloride	0.2	ND	ND	ND	ND	ND	ND	ND	ND
Total		1.42	1.273	7.831	0.229	2.18	4.646	5.861	0.035

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS
STOCKPILE SAMPLES

	RCRA Toxic Concentration/TSCA Threshold								
Sample Date		8/21/2006	8/21/2006	8/21/2006	8/21/2006	8/22/2006	8/21/2006	8/22/2006	8/22/2006
Sample Time		1625	1445	1445	1500	630	1515	925	945
Stockpile #		Stockpile #2	Stockpile #3	Stockpile # 4/4B	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #7
Sample ID		S-082106-GD-006	S-082106-GD-001	S-082106-GD-007	S-082106-GD-002	S-082106-GD-009	S-082106-GD-003	S-082106-GD-012	S-082106-GD-011
No. of Sample Aliquots		8	14	12 (8 from 4, 4 from 4B)	6	4 (2 from each sub-pile)	6	16	16
TOTAL VOLATILE ORGANIC COMPOUNDS									
Acetone		ND	ND	ND	ND	ND	0.89	ND	ND
Benzene		1.2	0.43	ND	ND	ND	1.7	3.7	ND
Bromodichloromethane		ND	ND	ND	ND	ND	ND	ND	ND
Bromoform		ND	ND	ND	ND	ND	ND	ND	ND
Bromomethane		ND	ND	ND	ND	ND	ND	ND	ND
2-Butanone		ND	ND	ND	ND	ND	ND	ND	ND
Carbon disulfide		ND	ND	ND	ND	ND	ND	ND	ND
Carbon tetrachloride		ND	ND	ND	ND	ND	ND	ND	ND
Chlorobenzene		6.6	6.3	40	0.85	9.6	27000	120	0.34
Chloroethane		ND	ND	ND	ND	ND	ND	ND	ND
Chloroform		ND	ND	4.0	ND	ND	ND	ND	ND
Chloromethane		ND	ND	ND	ND	ND	ND	ND	ND
Cyclohexane		ND	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane		ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dibromo-3-chloropropane		ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dibromoethane		ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dichlorobenzene		45	28	61	3.9	280	66000	250	80
1,3-Dichlorobenzene		1.7	2.4	1.5	0.59	5.8	4.9	7.2	0.62
1,4-Dichlorobenzene		45	39	91	9.4	190	83000	280	56
Dichlorodifluoromethane		ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane		ND	ND	ND	ND	ND	0.63	0.66	ND
1,2-Dichloroethane		ND	ND	2.1	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene		4.7	11	1.6	2.6	2.0	5.2	2.1	ND
trans-1,2-Dichloroethene		ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethene		ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloropropane		ND	ND	ND	ND	ND	ND	ND	ND
cis-1,3-Dichloropropene		ND	ND	ND	ND	ND	ND	ND	ND
trans-1,3-Dichloropropene		ND	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene		1.8	ND	18	ND	0.86	12	8.3	ND
2-Hexanone		ND	ND	ND	ND	ND	ND	ND	ND
Isopropylbenzene		0.44	ND	1.9	ND	ND	2.2	1.1	ND
Methyl acetate		ND	ND	ND	ND	ND	ND	ND	ND
Methylene chloride		ND	ND	ND	ND	ND	ND	ND	ND
Methylcyclohexane		ND	ND	ND	ND	ND	ND	ND	ND
4-Methyl-2-pentanone		ND	ND	ND	ND	ND	ND	ND	ND
Methyl tert-butyl ether		ND	ND	ND	ND	ND	ND	ND	ND
Styrene		ND	0.35	ND	ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane		2.5	28	23	6.4	29	60	8.1	0.65
Tetrachloroethene		51	48	85	11	11	44000	96	ND
Toluene		7.4	ND	47	ND	ND	17	13	ND
1,2,4-Trichlorobenzene		39	28	39	3.9	58	39	21	120
1,1,1-Trichloroethane		6.1	4.9	57	2	0.94	21	12	ND
1,1,2-Trichloroethane		1.3	0.45	16	ND	ND	0.47	ND	0.34

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS
STOCKPILE SAMPLES

	RCRA Toxic Concentration/TSCA Threshold								
Sample Date		8/21/2006	8/21/2006	8/21/2006	8/21/2006	8/22/2006	8/21/2006	8/22/2006	8/22/2006
Sample Time		1625	1605	1605	1500	830	1515	925	905
Stockpile #		Stockpile #2	Stockpile #3	Stockpile # 6/#8	Stockpile #5	Stockpile #5B	Stockpile #5C	Stockpile #6	Stockpile #7
Sample ID		S-082106-GD-006	S-082106-GD-001	S-082106-GD-007	S-082106-GD-002	S-082206-GD-009	S-082106-GD-003	S-082206-GD-012	S-082206-GD-011
No. of Sample Aliquots		6	14	12 (8 from 4, 4 from 6B)	6	4 (2 from each sub-pile)	6	16	16
Trichloroethene		14	15	110	0.98	15	34	9.8	ND
Tetrachloroethene		ND	ND	ND	ND	ND	ND	ND	ND
1, 2-Trichloro-1,1,2-trifluoroethane		ND	ND	ND	ND	ND	ND	ND	ND
Vinyl chloride		ND	ND	ND	ND	ND	ND	ND	ND
Xylenes		22	ND	65	ND	1.4	61	27	ND
Total VOCs (mg/kg)		714.64	211.83	665.3	43.62	516	214279.99	793.96	257.95
Stockpile Volume - max. (tons)		350	250	400	200	100	100	650	225
Stockpile Volume - max. (kg)		317,515	226,796	362,874	181,437	90,718	90,718	589,670	204,117
Mass VOCs (kg)		68	48	236	7.91	47	19,439	472	53
Mass VOCs (tons)		0.075	0.053	0.260	0.009	0.052	21.430	0.520	0.058
TCLP-PESTICIDES									
Chlordane	0.003	NA	NA	NA	NA	NA	NA	NA	NA
Endrin	0.020	NA	NA	NA	NA	NA	NA	NA	NA
gamma-BHC	0.4	NA	NA	NA	NA	NA	NA	NA	NA
Heptachlor	0.008	NA	NA	NA	NA	NA	NA	NA	NA
Heptachlor epoxide	0.008	NA	NA	NA	NA	NA	NA	NA	NA
Methoxychlor	10.0	NA	NA	NA	NA	NA	NA	NA	NA
Toxaphene	0.5	NA	NA	NA	NA	NA	NA	NA	NA
TCLP HERBICIDES									
2,4,5-TP	1.0	NA	NA	NA	NA	NA	NA	NA	NA
2,4-D	10.0	NA	NA	NA	NA	NA	NA	NA	NA
GENERAL CHEMISTRY									
Cyanide		NA	NA	NA	NA	NA	NA	NA	NA
Reactive Sulfide		NA	NA	NA	NA	NA	NA	NA	NA
Phenolics		NA	NA	NA	NA	NA	NA	NA	NA
Paint Filter Test		NA	NA	NA	NA	NA	NA	NA	NA
pH		NA	NA	NA	NA	NA	NA	NA	NA
Ignitability		NA	NA	NA	NA	NA	NA	NA	NA
Extractable Organic Halides		NA	NA	NA	NA	NA	NA	NA	NA
Percent Moisture			15	12	8.0	20.0	12.0	8.9	13

Notes:

1. All concentrations are reported in parts per million
2. Analytical data shown is from samples collected during 2005-06 Removal Action efforts
3. Analytical data shown is being evaluated against the RCRA Toxicity thresholds, and TSCA threshold values
4. Evaluation standards (Column B) are bolded for emphasis
5. A dash (-) in column B indicates that no evaluation threshold was found
6. Bolded cells represent data that exceeded the applicable evaluation threshold value
7. NA means data was not analyzed for
8. Blank cells means data was neither requested nor reported
9. ND means the analyte was not detected

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE SOLIDS REMOVAL ACTION ANALYTICAL RESULTS STOCKPILE SAMPLES	RCRA Toxic Concentration/TSCA Threshold							
Sample Date		8/21/2006	8/21/2006	8/21/2006	8/22/2006	8/22/2006	8/22/2006	8/22/2006
Sample Time		1525	1536	1550	840	930	955	1010
Stockpile #		Stockpile # CP-5/CP-6	Stockpile # GC	Stockpile# TP-50/GC	Stockpile # TP-54	Stockpile # CP-30	Stockpile # TP-24/TP-25	Stockpile # TP-47
Sample ID		S-082106-CD-004	S-082106-CD-006	S-082106-CD-008	S-082206-CD-010	S-082206-CD-013	S-082206-CD-014	S-082206-CD-015
No. of Sample Aliquots		3	2	6	2	2	8	2
Parameter								
TCLP Metals								
Arsenic	5.0	NA	NA	NA	NA	NA	NA	NA
Barium	100.0	NA	NA	NA	NA	NA	NA	NA
Cadmium	1.0	NA	NA	NA	NA	NA	NA	NA
Chromium	5.0	NA	NA	NA	NA	NA	NA	NA
Lead	5.0	NA	NA	NA	NA	NA	NA	NA
Selenium	1.0	NA	NA	NA	NA	NA	NA	NA
Silver	5.0	NA	NA	NA	NA	NA	NA	NA
Mercury	0.2	NA	NA	NA	NA	NA	NA	NA
PCBs								
Aroclor 1016		ND	ND	ND	ND	ND	ND	ND
Aroclor 1221		ND	ND	ND	ND	ND	ND	ND
Aroclor 1232		ND	ND	ND	ND	ND	ND	ND
Aroclor 1242		1.3	0.89	ND	ND	64	ND	ND
Aroclor 1248		ND	ND	ND	ND	ND	ND	ND
Aroclor 1254		1.1	ND	ND	4.4	70	0.57	0.062
Aroclor 1260		ND	ND	ND	ND	14	ND	ND
Total	50.0	2.4	0.89	ND	4.4	128	0.57	0.062
Original Totals								
Original Sample Aliquots								
TCLP SEMIVOLATILE ORGANIC COMPOUNDS								
2,4,5-Trichlorophenol	400.0	ND	ND	ND	ND	ND	ND	ND
2,4,6-Trichlorophenol	2.0	ND	ND	ND	ND	ND	ND	ND
2,4-Dinitrotoluene	0.13	ND	ND	ND	ND	ND	ND	ND
2-Methylphenol	200.0	ND	ND	ND	ND	ND	ND	ND
3/4 Methylphenol	400.0	ND	ND	ND	ND	ND	ND	ND
Hexachlorobenzene	0.13	ND	ND	ND	ND	ND	ND	ND
Hexachlorobutadiene	0.5	ND	ND	ND	ND	ND	ND	ND
Hexachloroethane	3.0	ND	ND	ND	ND	ND	ND	ND
Nitrobenzene	2.0	ND	ND	ND	ND	ND	ND	ND
Pentachlorophenol	100.0	ND	ND	0.041	ND	ND	ND	ND
Pyridine	5.0	ND	ND	ND	ND	ND	ND	ND

Total VOCs

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS
STOCKPILE SAMPLES

	RCRA Toxic Concentration/TSCA Threshold								
Sample Date		6/21/2006	6/21/2006	6/21/2006	6/22/2006	6/22/2006	6/22/2006	6/22/2006	
Sample Time		1535	1535	1550	840	930	955	1010	
Stockpile #		Stockpile # CP-5/CP-6	Stockpile # CC	Stockpiled TP-50/OC	Stockpile # TP-56	Stockpile # CP-58	Stockpile # TP-24/TP-25	Stockpile # TP-47	Total VOCs
Sample ID		S-062106-GD-004	S-062106-GD-005	S-062106-GD-006	S-062206-GD-010	S-062206-GD-013	S-062206-GD-014	S-062206-GD-015	
No. of Sample Aliquots		3	2	6	2	2	8	2	
TOTAL SEMIVOLATILE ORGANIC COMPOUNDS									
Benzo(g,h,i)perylene		0.43	ND	ND	0.091	ND	0.04	0.27	
Anthracene		ND	3.5	2.9	0.037	ND	ND	ND	
Carbazole		ND	ND	ND	ND	ND	ND	ND	
Di-n-butyl phthalate		0.2	ND	ND	0.16	ND	0.1	0.044	
Fluoranthene		0.75	7.8	4.8	0.24	ND	0.058	0.3	
Pyrene		1.3	12	17	0.27	ND	0.09	0.28	
Butyl benzyl phthalate		ND	ND	ND	ND	ND	0.097	ND	
3,3'-Dichlorobenzidine		ND	ND	ND	ND	ND	ND	ND	
Benzo(a)anthracene		0.49	4.4	7.6	0.12	ND	ND	0.24	
Chrysene		0.71	9.1	13	0.18	ND	0.095	0.33	
bis(2-Ethylhexyl)phthalate		2.6	4.5	2.2	0.29	0.36	8.5	0.79	
Di-n-octyl phthalate		ND	ND	ND	ND	ND	ND	ND	
Benzo(b)fluoranthene		0.76	ND	2.6	0.13	ND	0.067	0.39	
Benzo(k)fluoranthene		0.6	ND	1.4	0.11	ND	0.044	0.29	
Benzo(a)pyrene		0.69	ND	2.5	0.11	ND	0.043	0.3	
Indeno(1,2,3-cd)pyrene		0.44	ND	0.79	0.084	ND	ND	0.29	
Dibenz(a,h)anthracene		ND	ND	ND	ND	ND	ND	0.11	
Acenaphthene		ND	0.91	ND	ND	ND	ND	ND	
2,4-Dinitrophenol		ND	ND	ND	ND	ND	ND	ND	
4-Nitrophenol		ND	ND	ND	ND	ND	ND	ND	
Dibenzofuran		ND	ND	ND	0.036	ND	ND	ND	
2,4-Dinitrotoluene		ND	ND	ND	ND	ND	ND	ND	
Diethyl phthalate		ND	ND	ND	ND	ND	ND	ND	
Fluorene		ND	0.83	ND	ND	ND	ND	ND	
4-Chlorophenyl phenyl ether		ND	ND	ND	ND	ND	ND	ND	
4-Nitroaniline		ND	ND	ND	ND	ND	ND	ND	
4,6-Dinitro-2-methylphenol		ND	ND	ND	ND	ND	ND	ND	
N-Nitrosodiphenylamine		ND	ND	ND	ND	ND	ND	ND	
4-Bromophenyl phenyl ether		ND	ND	ND	ND	ND	ND	ND	
Hexachlorobenzene		ND	ND	ND	ND	ND	ND	ND	
Atrazine		ND	ND	ND	ND	ND	ND	ND	
Pentachlorophenol		ND	ND	ND	ND	ND	ND	ND	
Phenanthrene		0.25	1.4	2.9	0.2	ND	0.05	0.13	
Naphthalene		ND	ND	ND	0.089	ND	0.039	ND	
4-Chloroaniline		ND	ND	ND	ND	ND	ND	ND	
Hexachlorobutadiene		ND	ND	ND	ND	ND	ND	ND	
Carbazole		ND	ND	ND	ND	ND	ND	ND	
4-Chloro-3-methylphenol		ND	ND	ND	ND	ND	ND	ND	
2-Methylnaphthalene		ND	1.7	1.1	0.33	ND	ND	ND	
bis(2-chloroethoxy)methane		ND	ND	ND	ND	ND	ND	ND	
2,4,6-Trichlorophenol		ND	ND	ND	ND	ND	ND	ND	
2,4,5-Trichlorophenol		ND	ND	ND	ND	ND	ND	ND	
1,1'-Biphenyl		ND	ND	ND	0.04	ND	ND	ND	

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE

SOLIDS REMOVAL ACTION ANALYTICAL RESULTS

STOCKPILE SAMPLES

	RCRA Toxic Concentration/TSCA Threshold								
Sample Date		6/21/2006	6/21/2006	6/21/2006	6/22/2006	6/22/2006	6/22/2006	6/22/2006	
Sample Time		1525	1535	1800	840	930	950	1010	
Stockpile #		Stockpile # GP-5/GP-6	Stockpile # CC	Stockpile# TP-50/CC	Stockpile # TP-54	Stockpile # CP-30	Stockpile # TP-34/TP-35	Stockpile # TP-47	Total VOCs
Sample ID		S-062106-GD-004	S-062106-GD-005	S-062106-GD-008	S-062206-GD-010	S-062206-GD-013	S-062206-GD-014	S-062206-GD-015	
No. of Sample Aliquots		3	2	6	2	2	6	2	
2-Chloronaphthalene		ND	ND	ND	ND	ND	ND	ND	
2-Nitroaniline		ND	ND	ND	ND	ND	ND	ND	
Dimethylphthalate		ND	ND	ND	ND	ND	ND	ND	
2,6-Dinitrotoluene		ND	ND	ND	ND	ND	ND	ND	
Acenaphthylene		ND	ND	ND	ND	ND	ND	ND	
3-Nitroaniline		ND	ND	ND	ND	ND	ND	ND	
Acenaphthene		ND	ND	ND	ND	ND	ND	ND	
Phenol		ND	ND	ND	ND	ND	ND	ND	
bis(2-Chloroethyl)ether		ND	ND	ND	ND	ND	ND	ND	
2-Chlorophenol		ND	ND	ND	ND	ND	ND	ND	
2-Methylphenol		ND	ND	ND	ND	ND	ND	ND	
2,2'-oxybis(1-Chloropropane)		ND	ND	ND	ND	ND	ND	ND	
Acetophenone		ND	ND	ND	ND	ND	ND	ND	
4-nitroaniline-n-propylamine		ND	ND	ND	ND	ND	ND	ND	
Hexachloroethane		ND	ND	ND	ND	ND	ND	ND	
Nitrobenzene		ND	ND	ND	ND	ND	ND	ND	
Isophorone		ND	ND	ND	ND	ND	0.14	ND	
2-Nitrophenol		ND	ND	ND	ND	ND	ND	ND	
2,4 Dimethylphenol		ND	ND	ND	ND	ND	ND	ND	
bis(2-Chloroethoxy)methane		ND	ND	ND	ND	ND	ND	ND	
2,4 Dichlorophenol		ND	ND	ND	ND	ND	ND	ND	
Total SVOCs (mg/kg)		9.22	77.4	78.79	2.524	78.79	9.363	3.16	
Stockpile Volume - max. (tons)		30	75	112.5	7.5	12	120	15	
Stockpile Volume - max. (kg)		27,216	68,039	102,058	6,804	10,886	108,862	13,608	
Mass SVOCs (kg)		0.251	5.268	8.041	0.017	0.858	1.019	0.043	418.99
Mass SVOCs (tons)		0.0003	0.0058	0.0089	0.0000189	0.0009453	0.0011236	0.0000475	0.46
TCLP VOLATILE ORGANIC COMPOUNDS									
1,1 Dichloroethene	0.7	ND	ND	ND	ND	ND	ND	ND	
1,2 Dichloroethane	0.5	ND	ND	ND	ND	ND	ND	ND	
1,1 Dichloroethene	7.5	0.024	0.054	0.028	0.026	0.023	0.012	0.0151	
Benzene	0.5	ND	0.0015	0.0042	ND	ND	ND	ND	
Carbon Tetrachloride	0.5	ND	ND	ND	ND	ND	ND	ND	
Chlorobenzene	100.0	ND	ND	ND	ND	0.0074	0.007	ND	
Chloroform	6.0	ND	ND	ND	ND	ND	ND	ND	
Methyl ethyl ketone	200.0	ND	ND	ND	ND	ND	ND	ND	
Tetrachloroethene	0.7	0.59	0.019	0.10	ND	ND	0.0089	ND	
Trichloroethene	0.5	0.018	0.013	0.003	ND	ND	0.016	ND	
Vinyl chloride	0.2	ND	ND	ND	ND	ND	ND	ND	
Total		0.632	0.066	0.215	0.026	0.0324	0.0439	0.0051	

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE									
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS									
STOCKPILE SAMPLES									
	RCRA Toxic Concentration/TSCA Threshold								
Sample Date		8/21/2006	8/21/2006	8/21/2006	8/22/2006	8/22/2006	8/22/2006	8/22/2006	
Sample Time		1525	1535	[illegible]	[illegible]	930	955	1010	
Stockpile #		Stockpile # GP-5/GP-6	Stockpile # GC	Stockpile# TP-[illegible]/GC	Stockpile # TP-54	Stockpile # GP-20	Stockpile # TP-24/TP-25	Stockpile # TP-47	Total VOCs
Sample ID		S-082106-CD-004	S-082106-CD-00[illegible]	S-082106-CD-00[illegible]	S-082206-CD-010	S-082206-CD-013	S-082206-CD-014	S-082206-CD-015	
No. of Sample Aliquots		3	2	6	2	2	8	2	
TOTAL VOLATILE ORGANIC COMPOUNDS									
Acetone		ND	0.44	ND	ND	0.055	0.0064	0.14	
Benzene		ND	ND	ND	0.33	0.019	0.0014	ND	
Bromodichloromethane		ND	ND	ND	ND	ND	ND	ND	
Bromoform		ND	ND	ND	ND	ND	ND	ND	
Bromomethane		ND	ND	ND	ND	ND	ND	ND	
2-Butanone		ND	ND	ND	ND	0.047	0.0045	ND	
Carbon disulfide		ND	ND	ND	ND	ND	ND	ND	
Carbon tetrachloride		ND	ND	ND	ND	ND	ND	ND	
Chlorobenzene		ND	0.26	ND	ND	ND	0.0022	ND	
Chloroethane		ND	ND	ND	ND	ND	ND	ND	
Chloroform		ND	ND	ND	ND	0.014	0.00174	ND	
Chloromethane		ND	ND	ND	ND	ND	ND	ND	
Cyclohexane		ND	ND	ND	ND	ND	ND	ND	
Dibromochloromethane		ND	ND	ND	ND	ND	ND	ND	
1,2-Dibromo-3-chloro-propane		ND	ND	ND	ND	ND	ND	ND	
1,2-Dibromoethane		ND	ND	ND	ND	ND	ND	ND	
1,2-Dichlorobenzene		0.59	0.53	ND	0.097	ND	0.00191	ND	
1,3-Dichlorobenzene		ND	ND	ND	ND	ND	ND	ND	
1,4-Dichlorobenzene		12	5.4	2.4	0.11	0.018	0.00096	ND	
Dichlorodifluoromethane		ND	ND	ND	ND	ND	ND	ND	
1,1-Dichloroethane		ND	ND	ND	ND	ND	ND	ND	
1,2-Dichloroethane		ND	ND	ND	ND	ND	ND	ND	
cis-1,2-Dichloroethene		0.36	ND	1.4	ND	0.032	0.0028	ND	
trans-1,2-Dichloroethene		ND	ND	ND	ND	ND	ND	ND	
1,1-Dichloroethene		ND	ND	ND	ND	ND	ND	ND	
1,2-Dichloropropane		ND	ND	ND	ND	ND	ND	ND	
cis-1,3-Dichloropropene		ND	ND	ND	ND	ND	ND	ND	
trans-1,3-Dichloropropene		ND	ND	ND	ND	ND	ND	ND	
Ethylbenzene		0.55	ND	ND	0.13	ND	0.012	ND	
2-Hexanone		ND	ND	ND	ND	ND	ND	ND	
Isopropylbenzene		ND	ND	ND	0.13	ND	ND	ND	
Methyl acetate		ND	ND	ND	ND	ND	ND	ND	
Methylene chloride		ND	ND	ND	ND	0.032	0.018	ND	
Methylcyclohexane		ND	ND	ND	ND	ND	ND	ND	
4-Methyl-2-pentanone		ND	ND	ND	ND	ND	ND	ND	
Methyl tert-butyl ether		ND	ND	ND	ND	ND	ND	ND	
Styrene		ND	ND	ND	ND	ND	ND	0.056	
1,1,2,2-Tetrachloroethane		ND	ND	ND	ND	ND	ND	ND	
Tetrachloroethene		39	2.0	72	ND	0.12	0.0049	1.6	
Toluene		0.76	ND	0.32	0.38	0.2	0.016	ND	
1,2,4-Trichlorobenzene		ND	6.0	18	ND	ND	ND	ND	
1,1,1-Trichloroethane		1.9	1.1	22	ND	0.12	0.0071	0.051	
1,1,2-Trichloroethane		ND	ND	ND	ND	ND	ND	ND	

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS
STOCKPILE SAMPLES

	RCRA Toxic Concentration/TSCA Threshold								
Sample Date		8/21/2006	8/21/2006	8/21/2006	8/22/2006	8/22/2006	8/22/2006	8/22/2006	
Sample Time		1525	1539	1509	840	930	955	1010	
Stockpile #		Stockpile # GP-5/GP-6	Stockpile # GC	Stockpile# TP-50/GC	Stockpile # TP-54	Stockpile # GP-30	Stockpile # TP-26/TP-25	Stockpile # TP-47	Total VOCs
Sample ID		S-082106-GD-004	S-082106-GD-005	S-082106-GD-006	S-082306-GD-010	S-082306-GD-013	S-082306-GD-014	S-082306-GD-015	
No. of Sample Aliquots		3	2	6	2	2	6	2	
Trichloroethene		1.4	0.48	2.5	ND	0.2	0.015	0.0372	
Trichlorofluoromethane		ND	ND	ND	ND	ND	ND	ND	
1,1,2-Trichloro-1,1,2 trifluoroethane		ND	ND	ND	ND	ND	ND	ND	
Vinyl chloride		ND	ND	ND	ND	ND	ND	ND	
Xylenes		1.1	ND	ND	1.0	0.019	0.0075	ND	
Total VOCs (mg/kg)		48.86	16.21	19.82	1.277	0.576	0.09261	1.92	
Stockpile Volume - max. (tons)		90	75	112.5	7.5	12	120	15	
Stockpile Volume - max. (kg)		27,216	68,039	102,058	6,804	10,886	108,862	13,608	
Mass VOCs (kg)		1.330	1.103	2.023	0.009	0.019	0.010	0.026	20,373.10
Mass VOCs (tons)		0.0015	0.0012	0.0022	0.0000091	0.0000105	0.0000111	0.0000268	22.46
TCLP-PESTICIDES									
Chlordane	0.003	NA	NA	NA	NA	NA	NA	NA	
Endrin	0.020	NA	NA	NA	NA	NA	NA	NA	
gamma-BHC	0.4	NA	NA	NA	NA	NA	NA	NA	
Heptachlor	0.008	NA	NA	NA	NA	NA	NA	NA	
Heptachlor epoxide	0.008	NA	NA	NA	NA	NA	NA	NA	
Methoxychlor	10.0	NA	NA	NA	NA	NA	NA	NA	
Toxaphene	0.5	NA	NA	NA	NA	NA	NA	NA	
TCLP HERBICIDES									
2,4,5-TP	1.0	NA	NA	NA	NA	NA	NA	NA	
2,4-D	10.0	NA	NA	NA	NA	NA	NA	NA	
GENERAL CHEMISTRY									
Cyanide		NA	NA	NA	NA	NA	NA	NA	
Reactive Sulfide		NA	NA	NA	NA	NA	NA	NA	
Phenolics		NA	NA	NA	NA	NA	NA	NA	
Paint Filter Test		NA	NA	NA	NA	NA	NA	NA	
pH		NA	NA	NA	NA	NA	NA	NA	
Ignitability		NA	NA	NA	NA	NA	NA	NA	
Extractable Organic Halides		NA	NA	NA	NA	NA	NA	NA	
Percent Moisture		7.8	11	4.8	5	21	7.6	4.3	

Notes:

1. All concentrations are reported in parts per million.
2. Analytical data shown is from samples collected during 2005-06 Removal Action efforts.
3. Analytical data shown is being evaluated against the RCRA Toxicity thresholds and TSCA threshold values.
4. Evaluation standards (column B) are bolded for emphasis.
5. A slash (-) in column B indicates that no evaluation threshold was found.
6. Bolded cells represent data that exceeded the applicable evaluation threshold value.
7. NA means data was not analyzed for.
8. Blank cells means data was neither requested nor reported.
9. ND means the analyte was not detected.

DRAFT

RRG/Clayton Chemical Site
Sauget, St. Clair County, Illinois
Field Sample Key
Stockpile Re-characterization/Soil Milling Field Trial

Sample Dates: August 21-23, 2006

Date	Time	Sample Identification	Location	PID Readings (ppm) (Highest Reading from Composite)	Comments
Soil Characterization Samples					
8/21/2006	1445	S-082106-GD-001	Stockpile #3	N/A	Sample composite of 16 sample locations within stockpile.
8/21/2006	1500	S-082106-GD-002	Stockpile #5	N/A	Sample composite of 6 sample locations within stockpile.
8/21/2006	1515	S-082106-GD-003	Stockpile #5C	N/A	Sample composite of 2 sample locations within stockpile.
8/21/2006	1525	S-082106-GD-004	Stockpile #GP-5/GP-6	N/A	Sample composite of 3 sample locations within stockpile.
8/21/2006	1535	S-082106-GD-005	Stockpile #GC	N/A	Sample composite of 2 sample locations within stockpile.
8/21/2006	1550	S-082106-GD-006	Stockpile #T50/GC	N/A	Sample composite of 6 sample locations within stockpile.
8/21/2006	1605	S-082106-GD-007	Stockpile #4/4B	N/A	Sample composite of 12 sample locations within stockpile.
8/21/2006	1625	S-082106-GD-008	Stockpile #2	N/A	Sample composite of 8 sample locations within stockpile.
8/22/2006	0830	S-082206-GD-009	Stockpile #5B	N/A	Sample composite of 4 sample locations within stockpile.
8/22/2006	0840	S-082206-GD-010	Stockpile #TP-54	N/A	Sample composite of 2 sample locations within stockpile.
8/22/2006	0905	S-082206-GD-011	Stockpile #7	N/A	Sample composite of 16 sample locations within stockpile.
8/22/2006	0925	S-082206-GD-012	Stockpile #6	N/A	Sample composite of 16 sample locations within stockpile.
8/22/2006	0930	S-082206-GD-013	Stockpile #TP-20	N/A	Sample composite of 2 sample locations within stockpile.
8/22/2006	0955	S-082206-GD-014	Stockpile #TP-24/TP-25	N/A	Sample composite of 8 sample locations within stockpile.
8/22/2006	1010	S-082206-GD-015	Stockpile #47	N/A	Sample composite of 3 sample locations within stockpile.

DRAFT

RRG/Clayton Chemical Site
Sauget, St. Clair County, Illinois
Field Sample Key
Stockpile Re-characterization/Soil Milling Field Trial

Sample Dates: August 21-23, 2006

Date	Time	Sample Identification	Location	PID Readings (ppm) (Highest Reading from Composite)	Comments
Soil Milling Samples					
8/22/2006	1410	S-082206-GD-016	Stockpile #3	363.4	Pre-Milling Sample from composite of approximately 8-12 Cubic Yards
8/22/2006	1442	S-082206-GD-017	Stockpile #3- Post Treat	112.7	Post treatment sample
8/22/2006	1510	S-082206-GD-018	Stockpile #5	14.4	Pre-Milling Sample from composite of approximately 8-12 Cubic Yards
8/22/2006	1544	S-082206-GD-019	Stockpile #5 - Post Treat	6.8	Post treatment sample
8/22/2006	1610	S-082206-GD-020	Stockpile #4	290	Pre-Milling Sample from composite of approximately 8-12 Cubic Yards
8/22/2006	1628	S-082206-GD-021	Stockpile #4- Post Treat Rnd 1	12.8	Post treatment sample
8/22/2006	1640	S-082206-GD-022	Stockpile #4- Post Treat Rnd 2	580	Post treatment sample
8/23/2006	0915	S-082306-GD-023	Stockpile #2	1668	Pre-Milling Sample from composite of approximately 8-12 Cubic Yards
8/23/2006	0930	S-082306-GD-024	Stockpile #2 - Post Treat Rnd 1	1068	Post treatment sample
8/23/2006	0955	S-082306-GD-025	Stockpile #2 - Post Treat Rnd 2	307	Post treatment sample
8/23/2006	1015	S-082306-GD-026	Stockpile #6	907	Pre-Milling Sample from composite of approximately 8-12 Cubic Yards
8/23/2006	1030	S-082306-GD-027	Stockpile #6 - Post Treat Rnd 1	1362	Post treatment sample
8/23/2006	1050	S-082306-GD-028	Stockpile #6 - Post Treat Rnd 2	301	Post treatment sample